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NOT FOR SERVICE OF LITIGATION PAPERS

April 17, 2024

BY ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

*Application + file
Under Seal granted.
50 ordered.
4/17/24 JGK/Koeltl
U.S.D.J.*

**Re: City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,
USDC, SDNY Case No. 19 Civ. 2645 (AJN) (KHP) (the "Action")**

Dear Judge Koeltl:

We represent Defendants Daniel Ridloff and RRMI-DR LLC (the "Ridloff Defendants") in the above referenced case, and write pursuant to Rule 21.8 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York and Paragraph 8 of the Court's Stipulated Protective Order in this case [ECF No. 51] to request that certain declaration exhibits to Ridloff Defendants' motion in limine be provisionally filed under seal.

Among the exhibits that the Ridloff Defendants attach to their memorandum of law are:

1. Exhibit A: Plaintiffs' expert report of Claude Arnold
2. Exhibit B: a portion of Plaintiffs' expert report of Seth Fliegler
3. Exhibit C: Plaintiffs' expert report of David Schechtman
4. Exhibit E: Settlement Agreement and General Release

Exhibits A, B, and C are expert reports produced by the Plaintiffs in this action. They have been designated confidential by Plaintiffs as they contain and rely on information that is non-public as well as testimony designated confidential by various other parties. Upon information and belief, at least some of these exhibits, Exhibits B and C, have been previously filed in this matter under seal as ECF Nos. 469-1, 469-7.

Exhibit E is a settlement agreement and general release between Defendant Felix Sater and a party in the related action. See Case No. 15 Civ. 5345. It was produced by Plaintiffs in this action, and contains information designated by Plaintiffs as confidential under the protective order. [ECF No. 51] The agreement itself has not been made public, and, upon information and

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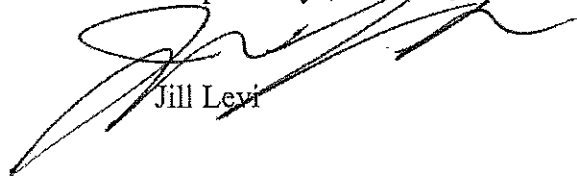
Page-2-

belief, has so far not been relied on by any court in connection with any exercise of judicial authority.

As such, the Ridloff Defendants respectfully request that the Court maintain Exhibits A, B, C, and E under seal until such time that Your Honor rules on whether the materials should remain under seal. The Ridloff Defendants take no position on whether these papers should be sealed.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jill Levi", is written over the typed name.

Jill Levi